

MATTOLE WATERSHED SALMON SUPPORT GROUP

Post Office Box 188 • Petrolia, CA 95558 • (707) 629-3670 / 3660

Bruce Halstead
US Fish and Wildlife
1125-16th Street, Room 209
Arcata, California 95521
RE: Permit Number PRT-828950 and 1157

RECEIVED
NOV 11 11/14/98
US Fish & Wildlife Service
CCFWO, Arcata, CA

5510

11/14/98

Dear Mr. Halstead:

The Mattole Salmon Group is a citizen-run, non-profit organization in the Mattole Valley that has been working since 1980 to restore our chinook and coho salmon runs. Those runs have declined since the end of World War II to a pittance of the great abundance that once existed here. Salmon runs reached their all-time low in 1990 when as few as 200 individuals of both species spawned in the Mattole. Since that time, a slow but steady rebuilding trend has been observed. (We carry on annual spawner surveys and carcass counts, downstream migrant trap monitoring and mainstem summertime dive surveys in cooperation with the Bureau of Land Management, Environmental Protection Agency and California Department of Fish and Game.)

MWSSG-
1

It is our interpretation, based on long observation, systematic survey and monitoring that timber harvest and road building have been the major factors in the degradation of spawning and rearing habitat that has led to the salmon's decline. The specifics of the impacts on watershed health need not be rehearsed here in detail, but, in general, excess sedimentation, silt related flooding and subsequent bank denudation, extreme water temperatures (average daytime highs in the Mattole in July and August regularly reach the high 70's and often, 80 degrees F.) and lack of large woody debris have collectively reduced the habitat capacity of the Mattole. Coho especially suffer because of their requirement for cool water during their first summer which they spend in their natal creeks or nearby.

MWSSG-
2

The Lower North Fork of the Mattole, where most of the 2,500 acres of old growth that Pacific Lumber Company (PL) owns in this valley resides, is perhaps the greatest sediment producer in the Mattole. Its relationship to the Mattole Sheer Zone, itself a manifestation of the great triple junction, is long and well documented. (See "Permanent Ground Movement Map" and "Earthquake Epicenter Map". This background situation of geologic instability has been exacerbated by intensive logging in the drainage and in the Upper North Fork which is contiguous. Over the past 12 years, PL has logged 1648 acres in the two tributary drainages, most of it clearcutting in old growth. In PL's HCP/SYP, an additional 1600 acres is slated to be logged in the next few years. The first plan in this area that falls under the protocols established under the Pre-Permit Agreement in Principle of the HCP, THP 1-97-307, was stopped by federal court injunction after a judge determined that it was likely that coho salmon would be taken. The case is currently awaiting final dispensation, but meanwhile, USFS Redwood Science Laboratory geologist, Leslie Reed, has determined that the silvicultural prescription on #307 is "considerably more likely to generate

landsliding than the practices employed at Bear Creek". Bear Creek, if reminders are in order, is the drainage in which mass wasting from recent PL logging sites inundated 5km of the lower mainstem with up to 3 m of new sediment. In other words, mass wasting was likely to occur on sites where PL was being permitted to log under HCP protocols.

MWSSG-
2
Con.

Our first concern, then, is prevention of mass wasting--debris torrents and flows, mudslides, landslides. Before we elaborate on what might be the inadequacies of the Hillslope Management section of the HCP, a few words are in order about the comprehensibility of the relationship between interim measures, default strategies and the watershed analysis. It is extremely difficult to sort out what measures ultimately apply, who has final word on their application and what is the ultimate default, or fall back, position. This lack of clarity potentially calls into question the entire process, especially for the Mattole and Bear Rivers where a full watershed assessment will not be completed, according to the text, until the third decade of the HCP, after almost all the old growth logging will have been completed. (This reading of #5 a. 1. of the Plan seems accurate given the schedule indicated for completing the road-related sediment assessment prior to the full watershed assessment)

There are two major problems in the Hillslope Management element of the HCP. One is that under the default strategies, only road building limitations are triggered by high erosion hazard ratings, not limits to silvicultural methods. Several instances of mass wasting on steep headland swales where no roads were built have been documented on recent PL logging shows, including those on Bear Creek. Clearcutting and other even-aged prescriptions, even without roads or cable yarding systems, may be inappropriate on certain slopes. Selection harvest or small group selection which leaves more than 50% of the basal area in place seem the only reasonable option for wise hillslope management where high to extreme mass wasting potential exists.

MWSSG-
3

The other problem is one that is somewhat consistent throughout the HCP. Final authority resides with Pacific Lumber Company scientists and the California Department of Forestry. There are simply too many authenticated instances where this particular teaming arrangement arrived at considerably different conclusions about what practices would have good results than did other reputable scientists. The Mattole plan discussed above is a good example. Two geologists in PL's employ signed off on the logging that Leslie Reed suggested was likely to produce mass wasting.

MWSSG-
4

Given that there is no real accountability written into this system--that is, if mass wasting were to occur, the geologists, the company that employed them and CDF staff members who signed off on the plan on the geologists' word would not be held responsible--the Salmon Group would be forced to seek compensatory damages for the salmon. Our 20 years of work, much of it state-supported, can be jeopardized by excesses of sediment delivered from the Lower North Fork into the Mattole mainstem and the into the fragile estuary system four miles downstream. (The January 1, 1997 storm mobilized sufficient sediments through the Lower North Fork and into the mainstem to produce startling losses of riparian habitat downstream, threats to homes and a business and considerable additional estuary infilling.) Our chinook salmon are dependent upon the estuary as smolts. Coho, of course, are effected higher in the system. Coho fingerlings were spotted in the lower North Fork by divers involved in surveys for NMFS last August.

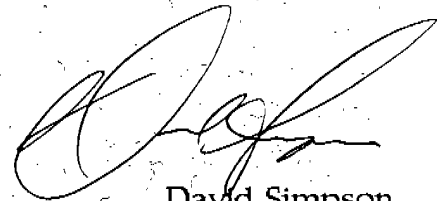
MWSSG-
5

hwsse-
6

A final concern of ours has to do with Riparian Management Zones, especially for Class III stream buffers. It is basically the same concern as for Hillslope Management. Debris torrents are more likely to be precipitated during storm events either on steep headland swales, as mentioned above, or in steep Class III tribs. According to my reading of the HCP, there are Equipment Limitation Zones and Exclusion Zones related to % of grade, but there is no tree retention required. I suggest that % of slope should also determine a basal area retention formula, with a minimum of 50% retention in lower gradient Class III RMZ's and higher in higher gradient zones. Zone widths should also relate to gradient with a minimum No Cut zone throughout.

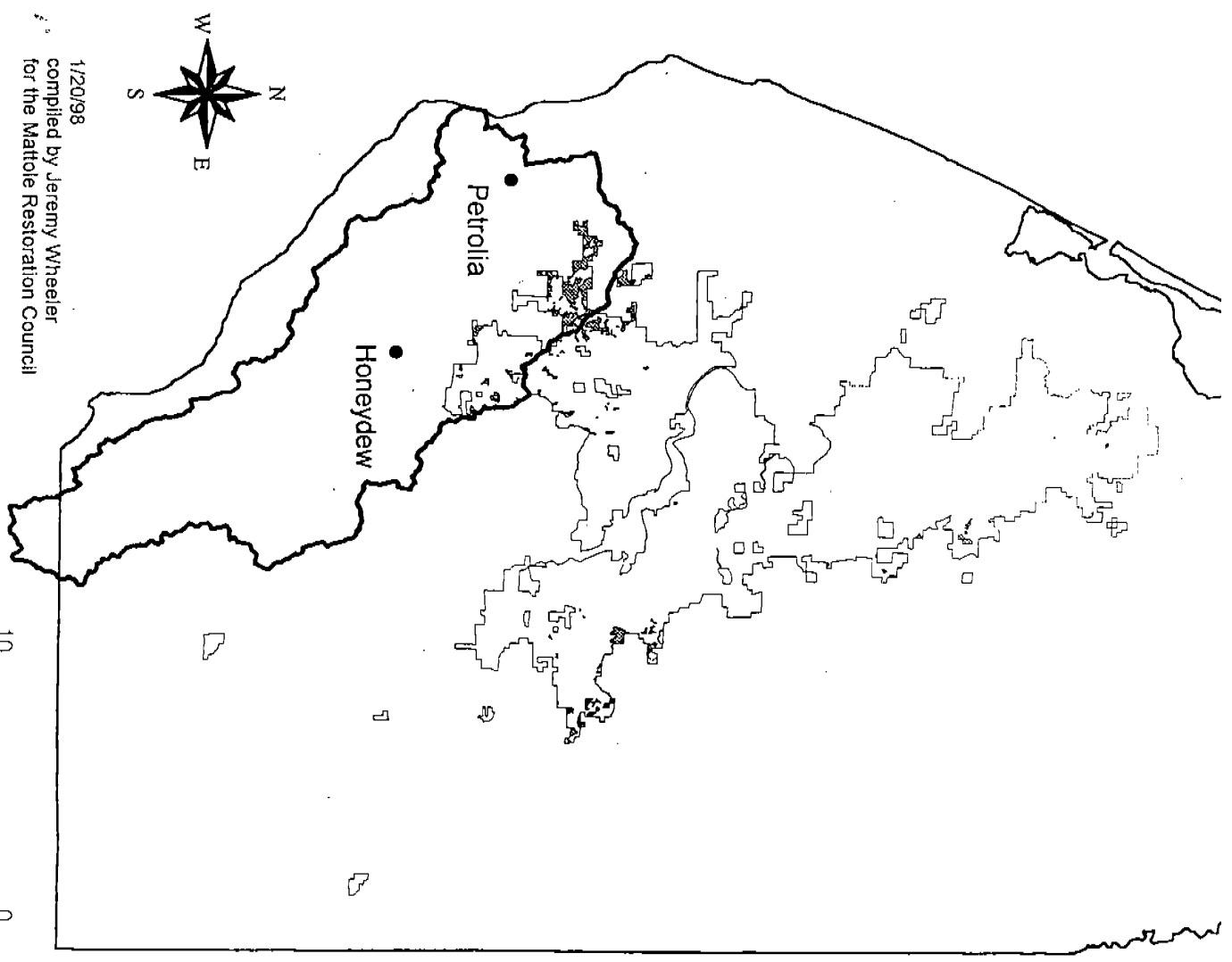
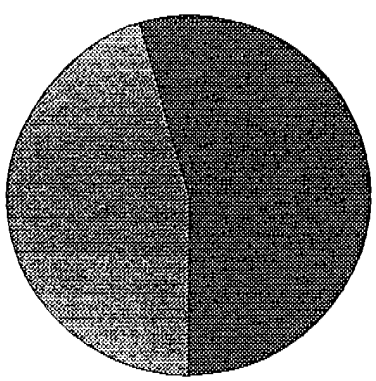
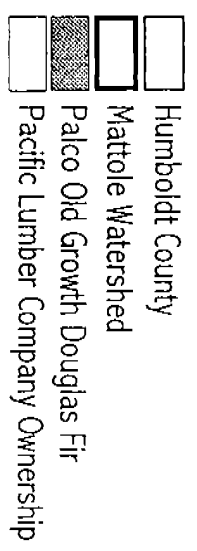
Please take these recommendations and comments under advisement. The HCP as currently written is inadequate to protect salmonids, including coho in the Mattole North Forks and should be significantly modified or rejected outright.

Thank you.



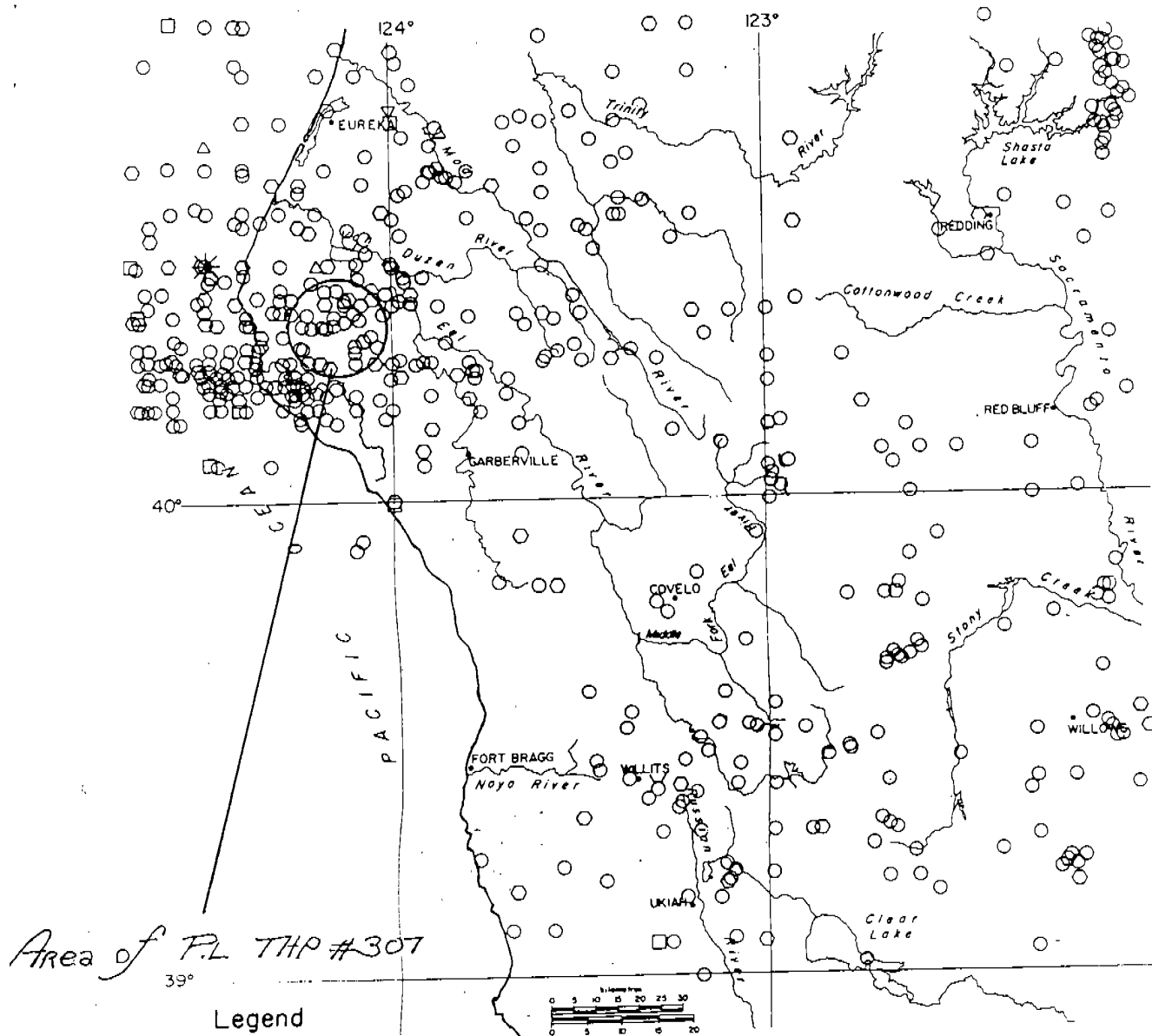
David Simpson
Director

54% of Maxxam Corporation's Old Growth Douglas-fir is in the Mattole Watershed



1/20/98
compiled by Jeremy Wheeler
for the Mattole Restoration Council





Earthquake Epicenter Map
1903 - 1981

The Mattole River watershed lies in one of the most geologically and seismically active areas in North America. Yellow dots denote earthquake epicenters; green lines denote mapped fault systems. The orange zone depicts the zone of maximum uplift resulting from the 1992 CMES.

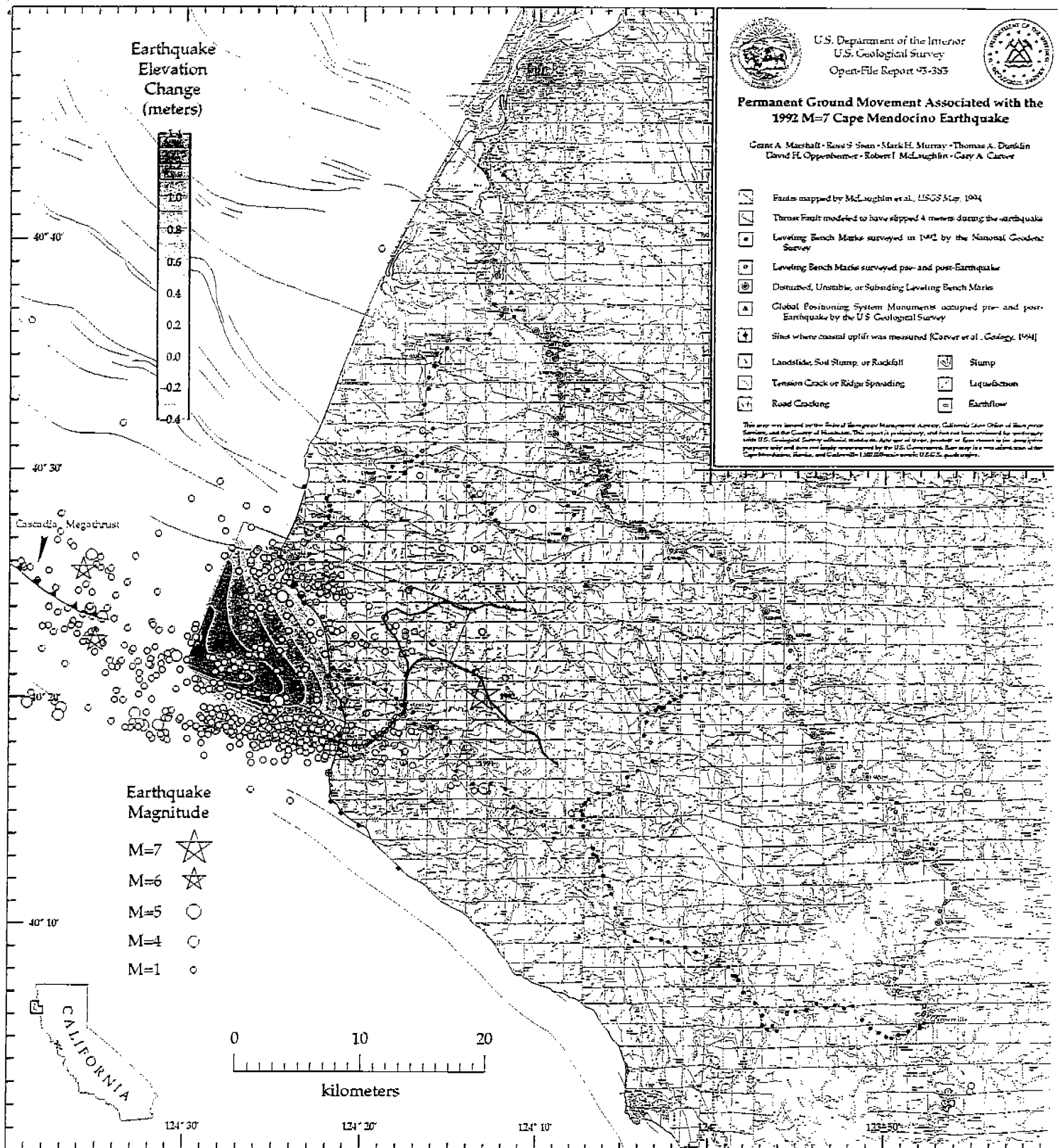


Figure 6. Permanent ground movement associated with the 1992 Cape Mendocino Earthquake Sequence (Marshall et al. 1993).



The mouth of the Lower North Fork of the Mattole River on the January 4th, 1997